

REMARKS

This is in response to the Office Action dated March 3, 2006. Applicants would like to thank the Examiner for the indicated allowability of claims 5 and 8 and respectfully request reconsideration and allowance of all remaining claims in view of the above-amendments and the following remarks.

I. REQUEST TO ENTER AMENDMENTS

Independent claim 1 is amended to clarify that the "master device" being released from a split in the last clause of claim 1 is a different master device than that whose identification is stored in the staging register.

The last clause of claim 1 now reads, ". . . to release a split of the master device that is next highest in the return command register."

This amendment does not raise new issues that would require further search and/or consideration since it only clarifies what is inherent in the existing claim. Existing claim 1 already identifies a staging register "for storing an identification of a master device whose identification is highest in order in the return command register." (Emphasis added). The control device "is responsive to a command from the master device whose identification is stored in the staging register . . . to release a split of the master device next in the return command register. Thus, the latter-mentioned master device must be the one that is next highest in the return command register.

While already inherent, the proposed amendment is believed to clarify the differences between the invention recited in claim 1 and the cited references for purposes placing the claims in condition for allowance or better form for appeal.

Applicants therefore respectfully request that the proposed amendment to claim 1 be entered.

II. REJECTION OF CLAIMS 1 AND 2 OVER ADMITTED PRIOR ART AND MARISETTY

Claims 1 and 2 were rejected as unpatentable over a combination of the admitted prior art and Marisetty (US 5,574,868).

A. **Deficiencies of Marisetty and Admitted Prior Art**

The early bus grant technique disclosed by Marisetty is discussed in Applicants' prior response and, for brevity, is not repeated in the present response.

The Examiner notes that the admitted prior art does not disclose a "staging register" for storing a master device's identification whose command is highest in order. The Office Action notes that Marisetty teaches a prediction technique to improve latency dealing with splits, but never addresses where or how a "staging register" is disclosed or suggested.

The Office Action further alleges that, in the admitted prior art, the slave device's means to release the split master is "equivalent to the claimed control device" - even though the admitted prior art is completely silent and contrary to the claimed features of the control device recited in claim 1.

The Office Action concludes that it would have been obvious to adapt Marisetty onto the admitted prior art to reduce latency by implementing an early bus grant technique.

Neither reference teaches or suggests the use of a staging register, and the Office Action completely ignores the limitations in claim 1 that define the "control device" (as un-amended or as amended above).

Claim 1 defines that the control device is responsive to a command from the master device whose identification is stored in the staging register. This is the master device whose identification is highest in order in the return command register. The control device is also responsive to the identification in the staging register to release a split of the

master device that is next highest in the return command register.

Thus, the control device responsively releases a split of the master device that is next highest in the return command register relative to the master device that is identified in the staging register.

This language has been completely ignored, and neither the admitted prior art nor Marisetty disclose such a control device.

In the so called admitted prior art, "the slave device removes the block from the requesting master device so that upon re-arbitration and re-grant to that master device, the master device re-issues its command to the slave device to complete the transfer." No control device is disclosed or suggested having the limitations recited in claim 1.

Marisetty's "early request" operates to re-grant system bus use to the master device whose transaction request is being presently honored. Again, no control device is disclosed or suggested having the limitations recited in claim 1. In an embodiment of the present invention, Applicants' "early request" releases the split on the next master device following the one whose transaction request is presently being honored.

C. Resulting Combination Would Still Lack the Claimed Staging Register and the Claimed Control Device.

Even if the admitted prior art were combined with Marisetty, the resulting combination would use the early bus grant technique of Marisetty, not that recited in claim 1. Neither reference discloses a staging register, and neither reference discloses a control device that releases the master device that is next highest in a return command register than the master device that is identified in the claimed staging register.

The resulting combination would therefore fail to teach or suggest the invention recited in claim 1.

For these reasons, the Office Action has failed to make a prima facie case of obviousness, and Applicants request that the rejection of claim 1 and its dependent claims be withdrawn.

III. REMAINING CLAIMS

Applicants' arguments with respect to the dependent claims and the rejection based on the further, Durdan reference are hereby incorporated by reference. The Durdan reference is irrelevant to Applicants' claims and to the Marisetty reference. No reasonable modification could be gleaned from the Durdan reference by a person of ordinary skill in the art, even with improper hindsight. Durdan relates to maintenance of cache coherency, not release of split bus masters.

In view of the foregoing, it is respectfully submitted that claims 1-8 as amended are patentable over the admitted prior art in combination with Marisetty or in combination with both Marisetty and Dordan.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 12-2252. -

Respectfully submitted,

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